

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

ADDITION OF EVERY DOOR DIRECT MAIL –
RETAIL TO THE PRODUCT LIST

DOCKET NO. MC2012-31

INITIAL BRIEF OF DAVID B. POPKIN

July 30, 2012

Respectfully submitted,

PRCMC201231BRIEF

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

On July 19, 2012, I submitted a Request for a Presiding Officer's Information Request [POIR]. No action was taken by the Presiding Officer as of July 27, 2012 and Initial Briefs are due by July 30, 2012, the next business day. Without having the ability to obtain clarification of the Postal Service's request, the public is not able to make appropriate comments. This assumes that all Postal Service requests will be complete and not require clarification. How can the Commission fully evaluate the Postal Service's request if the added information is not available?

The Postal Service restricts mail to flat-size pieces only and not to letter-size pieces. There is no explanation as to the reason for this. It would appear that the Postal Service could improve the service by allowing mailers to utilize letter-size mail pieces.

The requests for confirmation that were made in my original Request for POIR should be considered if they are not confirmed.

2. The minimum volume for a mailing is as follows:

Minimum: At least all addresses on one carrier route or box section, and 200 pieces, except if the entire ZIP code has fewer than 200 pieces, in which case the minimum is all available addresses within the ZIP Code

- a. Confirm that if a single ZIP Code has three carrier routes or box sections, each with 100 addresses, that the minimum mailing would be two of the three routes/sections.
 - b. Confirm that the mailer may be “forced” into sending mail to addressees that are not needed or appropriate just to reach the 200 piece minimum. For example, if a post office has two rural routes operating and one goes north from town and the other goes south from town and all of the customer’s business is north of town, the mailer may still have to send mail to the south rural route customers just to meet the 200 piece requirement.
3. Please confirm that a mailer has two options with respect to any given carrier route/box section and that is to send it to all residential customers or to all customers.
 4. Please confirm that deliveries will only be made to actual customers and that delivery will not be made to empty residences or to unrented post office boxes.
 5. Please confirm that the number of actual deliveries that are available on each carrier route and each box section are available on the Postal Service’s website. Provide the URL.

The proposed service is a Market Dominant service and there is no justification for the approximate 10% increase in the fee.